

Effective from: February 2021  
V2.2 Feb 2021 (T1)

### 1 INTRODUCTION

- 1.1 Facet5 are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.
- 1.2 Our website incorporates privacy controls which affect how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information. You can access the privacy controls via Account Settings and Sharing from the main menu. [Link to changing preferences]
- 1.3 We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information
- 1.4 Throughout this document we refer to Data Protection Legislation this means the Data Protection Act 2018 (DPA2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.
- 1.5 We are registered with the Information Commissioner's Office (the ICO) with registration number ZA065026
- 1.6 You can contact us either by phone, email, or post.

**Postal address:**

Facet5 Ltd  
Mill Yard Offices  
Childerley Estates  
St Neots Road  
Dry Drayton  
Cambridgeshire  
CB23 8BA

Phone: +44 (0)1954 602460  
Email: support@facet5global.com

**Our Data Protection contact is:**  
The Business Operations Manager

**Our EU Representative is:**  
The DPO Centre (Europe) Ltd.  
Alexandra House,  
Ballsbridge Business Park,  
Ballsbridge Park,  
Merrion Road,  
Dublin DO4 C7H2, Ireland  
Phone: +353 1 631 9460  
email: eurep@facet5global.com

- 1.7 The hosting facilities for our websites are situated in the Republic of Ireland (EU).

## **2 HOW WE USE YOUR PERSONAL DATA**

2.1 We only collect personal information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of personal information that we will collect on you, and you voluntarily provide to us on this website, form or service may include some or all of the following:

- Your name
- Email address
- Survey responses
- IP address

We may, in further dealings with you, extend this personal information to include your address, purchases, services used, and subscriptions, records of conversations and agreements and payment transactions.

- You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to deal with you as a prospective client, client or user of Facet5 services, in an efficient and effective manner.
- The legal basis for processing your data is based on your legitimate interest that we will have requested at the point the information was initially provided, therefore we will not store, process or transfer your data unless we have an appropriate lawful reason to do so.

2.2 We may use your data to:

- contact you, following your enquiry, reply to any questions, suggestions, issues, or complaints you have contacted us about;
- make available our products and services to you;
- process your orders;
- take payment from you or give you a refund;
- personalise your Facet5 experience, for example we may provide you with details of products that match a product, which you may have purchased or enquired about previously;
- review statistical analysis and to get feedback from you about our products, websites, and other services and activities. For example, occasionally we may invite you to review a product or service you've bought or used from us. If we do, it's possible that we'll use independent research and feedback providers to act on our behalf;
- power our security measures and services so you can safely access our website
- help us understand more about you as a customer, the products, and services you have purchased, so we can serve you better;
- contact you about products and services from us;
- provide you with online advertising and promotions; and
- help answer your questions and solve any issues you have.

## **3 PROVIDING YOUR PERSONAL DATA TO OTHERS**

We may share your personal data with other organisations in the following circumstances:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk); or
- From time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. However, all the information we share will be collected and anonymised, so neither you nor any of your devices can be identified from it.
- We will not share your information with any third parties for the purposes of direct marketing.
- We use data processors who are third parties who provide elements of services for us. We have Data Processor Agreements in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold your personal data securely and retain it for the period we instruct.

- Standard Contractual Clauses will be implemented for International transfers from controller to controller and controller to processor

#### **4 HOW WE KEEP YOU UPDATED ON OUR PRODUCTS AND SERVICES**

We will send you relevant offers and news about our products and services in a number of ways including by email, but only if you have previously consented to receive these marketing communications. When you register with Facet5 we will ask if you would like to receive marketing communications, and you can change your marketing choices online, over the phone or in writing at any time.

If you wish to amend your marketing preferences, you can do so by updating your preferences on our website or via email to [datasecurity@facet5global.com](mailto:datasecurity@facet5global.com)

#### **5 YOUR RIGHTS OVER YOUR INFORMATION**

##### **5.1 The right to be informed about our collection and use of personal data;**

You have the right to be informed about the collection and use of your personal data. We ensure we do this with our internal data protection policies and through our external website policy. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

##### **5.2 Right to Access Your Personal Information**

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 1 month from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out in section 1.6.

##### **5.3 Right to Correction Your Personal Information**

If any of the personal information we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out in section 1.6.

##### **5.4 Right to Stop or Limit Our Processing of Your Data**

You have the right to object to us processing your personal information for particular purposes, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out in section 1.6.

##### **5.5 Right to Erasure**

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

If you would like to exercise this right, please contact us as set out in section 1.6.

##### **5.6 Right to Portability**

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used, and machine-readable format. It also gives them you the right to request that a controller transmits this data directly to another controller.

If you would like to exercise this right, please contact us as set out in section 1.6.

## 5.7 For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly.

You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our absolute best to solve any problems you may have.

## 6 RETAINING PERSONAL DATA

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation. Unless otherwise required by law, your data will be stored indefinitely unless your right to erasure is executed, at which point it will be deleted.

## 7 THIRD PARTY WEBSITES AND SOCIAL MEDIA

7.1 Our website includes hyperlinks to, and details of, third party websites or social media links.

7.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 8 GIVING YOUR REVIEWS AND SHARING YOUR THOUGHTS

When using our websites, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts, so you are comfortable with how your information is used and shared on them.

## 9 PERSONAL DATA OF CHILDREN

9.1 Our website and services are targeted at persons over the age of 18.

9.2 If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

## 10 UPDATING INFORMATION

10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## 11 SECURITY

Data security is of great importance to Facet5 and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we have determined are entitled to be there by use of electronic access.;
- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, and offices.
- Never asking you for your passwords.

## 12 WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

Should Facet5 sell and/or the transfer control of all or part of our business, any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the purposes for which it was originally collected by us.

## 13 CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). We recommend that you check this policy regularly to keep up to date.

## 14 HOW TO CONTACT US

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

**By email:** For data security [datasecurity@facet5global.com](mailto:datasecurity@facet5global.com)

For general support and information email [support@facet5global.com](mailto:support@facet5global.com)

**By post:** Facet5 Ltd  
Mill Yard Offices  
Childerley Estates  
St Neots Road  
Dry Drayton  
Cambridgeshire  
CB253 8BA

EU Representative  
The DPO Centre (Europe) Ltd.  
Alexandra House,  
Ballsbridge Business Park,  
Ballsbridge Park,  
Merrion Road,  
Dublin DO4 C7H2, Ireland  
Phone: +353 1 631 9460  
email: [eurep@facet5global.com](mailto:eurep@facet5global.com)

Thank you for taking the time to read our Privacy Policy.